

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

DSCF Standard Mail Load Leveling

Docket No. N2014-1

PUBLIC REPRESENTATIVE  
SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS MALONE  
(PR/USPS-T1-11-20)

(January 15, 2014)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-T1-1-10 dated January 3, 2014, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Anne J. Siarnacki

Anne J. Siarnacki  
Public Representative for  
Docket No. N2014-1

901 New York Avenue, N.W.  
Washington, DC 20268-0001  
(202) 789-6880; Fax (202) 789-6891  
e-mail: [anne.siarnacki@prc.gov](mailto:anne.siarnacki@prc.gov)

Docket No. N2014-1

**PR/USPS-T1-11**

Please provide as soon as practicable after the February 3, 2014 comment deadline, copies of comments received in response to the Postal Service's proposed rule (USPS-LR-N2014-1/3).

**PR/USPS-T1-12**

Appendix A to USPS-LR-N2014-1/1 and Appendix C to USPS-LR-N2014-1/7 appear to be copies of the notice provided to mailers affected by the South Jersey and Southern Maryland Operations Tests.

- a. Please confirm that Appendix A to USPS-LR-N2014-1/1 and Appendix C to USPS-LR-N2014-1/7 are copies of the notice provided to mailers affected by the South Jersey and Southern Maryland Operations Tests. If not confirmed, please explain.
- b. How were these notices provided to affected mailers?
- c. When were affected mailers notified of the South Jersey and Southern Maryland Operations Tests?
- d. In addition to Appendix A to USPS-LR-N2014-1/1 and Appendix C to USPS-LR-N2014-1/7, was any other notice given to mailers affected by the South Jersey and Southern Maryland Operations Tests?
- e. If your response to part d is in the affirmative, please identify, describe, and provide all documents detailing the additional notice provided to affected mailers.
- f. If affected mailers were notified in advance of the applicable operations test, did the Postal Service track mailers that altered their entry days as a result of the test?
- g. If your response to part f is in the affirmative, please provide the data the Postal Service collected concerning mailers that altered their entry days as a result of the test.

**PR/USPS-T1-13**

On page 3 of your testimony, you state "I am informed that in Fiscal Year (FY) 2013, DSCF Standard Mail represented approximately 62 percent of all Standard Mail and about 32 percent of overall mail volume."

- a. Please provide the underlying data that supports this statement.
- b. Please provide the underlying data detailing what percentage of (1) Standard Mail and (2) the overall mail volume was DSCF Standard Mail in FY 2011 and FY 2012.

Docket No. N2014-1

**PR/USPS-T1-14**

On page 6 of your testimony, you describe the Postal Service's Color Code Policy for Standard Mail, which you state "is used to reinforce the general principle of First In, First Out."

- a. How is priority for processing determined among containers color coded for the same day?
- b. Please provide any protocol, policy, or other document that describes how containers color coded for the same day are prioritized and/or ordered for processing.

**PR/USPS-T1-15**

On pages 17 and 18 of your testimony, you describe the impact that carriers out on their routes after 17:00 on Mondays has on the cancellation of outgoing mail.

- a. Please provide workpapers detailing the number of cancellation runs that were extended in the South Jersey Processing and Distribution Center on the following Mondays: August 5, 12, 19, and 26, 2013; September 9, 16, 23, and 30, 2013; and October 7, 21, and 28, 2013.
- b. Please provide workpapers detailing the number of cancellation runs that were extended at the Southern Maryland Processing and Distribution Center on the following Mondays: October 7, 21, and 28, 2013; November 4, 18, and 25; and December 2, 9, 16, 23, and 30, 2013.

**PR/USPS-T1-16**

In response to PR/USPS-T1-1, you explain that there are relatively low volumes of DSCF Standard Mail (1) entered at the Section Center Facility in San Juan, Puerto Rico and destined for the U.S. Virgin Islands and (2) destined for American Samoa. Given that these mail pieces already have a 4-day service standard, what operational and/or economic benefits does the Postal Service expect to realize from instituting a 5-day service standard for such mail entered on Friday and Saturday?

**PR/USPS-T1-17**

In response to PR/USPS-T1-6, you state that the Capital District was selected for an operations test due in part to "a very high percentage of carriers out on their routes after 17:00 hours." Please provide workpapers detailing the number of carriers out past 17:00 in the area served by the Southern Maryland Processing and Distribution Center

Docket No. N2014-1

for each day during months of October 2012, November 2012, December 2012, October 2013, November 2013, and December 2013.

**PR/USPS-T1-18**

USPS-LR-N2014-1/7 describes the Standard Operating Procedures for the Southern Maryland Operations Test, which occurred during December 2013.

- a. Please identify, describe, and provide all documents detailing any qualitative information received during the Southern Maryland Operations Test.
- b. Please identify, describe, and provide all documents detailing any quantitative data gathered during the Southern Maryland Operations Test.
- c. Please describe and quantify, if possible, the observed impact of the Southern Maryland Operations Test on (1) carriers out on their routes after 17:00 and (2) carrier overtime hours.
- d. Please identify and describe any other benefits observed during the Southern Maryland Operations Test.
- e. Please describe any changes or improvements made to the Southern Maryland Operations Test (as compared to the South Jersey Operations Test) based on the experience of or lessons learned from the South Jersey Operations Test.
- f. Please describe any changes or improvements that were made to the Curseen-Morris Operations Test and/or that will be made to the Suburban Maryland Operations Test or any subsequent operations test based on the experience of or lessons learned from the South Jersey or Southern Maryland Operations Tests.

**PR/USPS-T1-19**

In response to PR/USPS-T1-7, you explain that the Postal Service intends “to test Load Leveling in one administrative District in each administrative Area of the postal system” and state that any additional testing “is expected to commence in February 2014.”

- a. Please identify the selected location(s) of any additional operations test(s).
- b. Please provide the dates for any operations test(s) listed in response to part a.
- c. If no additional locations have been selected, please provide the date by which the Postal Service expects to have finalized the selected location(s) for the February 2014 operations test(s).
- d. Please describe how the standard operating procedures will be developed for future operations tests and explain how improvements or changes will be made based on the experience of or lessons learned from prior completed operations tests.
- e. What additional information does the Postal Service expect to learn by testing “Load Leveling in one administrative District in each administrative Area of the postal system?”

**PR/USPS-T1-20**

On pages 18 through 20 of your testimony, you describe the Postal Service's planned communication efforts concerning implementation of the Load Leveling Plan.

- a. What specific outreach and/or communications efforts have been made to reach smaller and/or local Standard Mailers (*e.g.*, those mailing fewer than 100,000 DSCF Standard Mail pieces/year) concerning the Postal Service's Load Leveling Plan and/or the scheduled operations tests?
- b. What specific outreach and/or communication efforts will be made to reach smaller and/or local Standard Mailers (*e.g.*, those mailing fewer than 100,000 DSCF Standard Mail pieces/year) before the Load Leveling Plan is implemented nationwide?